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MEMO ENDORSED

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January 13, 2021

By ECF

Honorable Edgardo Ramos
U.S. District Judge
Southern District of New York
40 Foley Square
New York, N.Y. 10007

**Re: United States v. Angela Rodriguez
20 Cr. 39 (ER)**

The January 15 status conference is adjourned to March 31, 2021 at 11:30 a.m., and will occur by telephone. The parties are instructed to call (877) 411-9748 and enter access code 3029857# when prompted. Speedy trial time is excluded from January 15, 2021 until March 31, 2021.
SO ORDERED.



Edgardo Ramos, U.S.D.J

Dated: 1/14/2021

New York, New York

Dear Judge Ramos:

I represent defendant Angela Rodriguez in the above-referenced matter. A status conference has been scheduled in this matter for January 15, 2021 at 10:00 a.m. Due primarily to issues related to the current COVID-19 pandemic, the defense respectfully requests that the conference be adjourned to mid-to-late March 2021.

More specifically, this is a case with a voluminous amount of information which requires in-person, time-intensive meetings with Ms. Rodriguez in order for her to make informed and important decision about her case going forward. Unfortunately, for a number of reasons related to the pandemic, that is simply not possible right now. Moreover, Ms. Rodriguez is at liberty which makes a longer adjournment more practical in her case.

I have discussed these issues with AUSA Samuel Rothschild, who consents to this request. Of course, for these same reasons and in the interests of justice, the defense consents to the exclusion of time under the Speedy Trial Act until the anticipated adjourn date.

Thank you.

Respectfully,

/s/ Matthew J. Kluger

Matthew J. Kluger, Esq.

Attorney for Angela Rodriguez

cc: AUSA Samuel P. Rothschild